MARKS, O'NEILL, O'BRIEN, DOHERTY & KELLY, P.C.

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March 1, 2024

VIA ECF ONLY

Honorable Kiyo A. Matsumoto United States District Court, Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11202

> Re: 1567 56th Street, LLC et al v. Spitzer et al, 1:22-cv-04873-KAM-RML Case No. 22-cv-4873

Dear Judge Matsumoto:

This letter is being written jointly by the Law Offices of Yan Margolin, who represents Defendants Rosa Funding, Josh Weinfeld, and Isidor Bleier, and Kaitlyn Long who represents Defendants, Dekel Abstract, Abraham Teitelbaum, and Jehuda Weisz (hereinafter collectively referred to as the "Defendants"). The Defendants draft this letter in response to the Court's Orders dated, January 31, 2024 and February 23, 2024.

In response to the Orders, the Defendants have met and conferred with Plaintiff's Counsel regarding the proposed briefing schedule for the motions to dismiss. The parties respectfully request the following briefing schedule:

- Defendants to serve their respective motions by April 19, 2024;
- All opposition to be served by June 3, 2024; and
- Any Reply papers are due by June 28, 2024.

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We thank the Court for its attention to this matter.

Respectfully Submitted,

LAW OFFICE OF YAN MARGOLIN

MARKS O'NEILL O'BRIEN DOHERTY & KELLY P.C.

/s/ Yan Margolin
Yan Margolin, Esq.

/s/ Kaitlyn P. Long
Kaitlyn P. Long, Esq.

cc: All Counsel (via ECF and email)